

Sand Point Public Scoping Meeting
August 17, 2002
Aleutians East Borough Office

General Notes: The public scoping meetings were scheduled in times and locations to accommodate fishing schedules and provide additional access to community residents. The specific locations of the meetings were based on several factors including: (1) suggestions by members of the Council's Gulf of Alaska (GOA) Work Group; (2) the level of groundfish harvesting and processing activity among GOA communities; (3) the past involvement by representatives of these communities and their representatives in previous GOA rationalization committees and discussions; and (4) to provide additional access opportunities for public comment to those community residents who are not able to attend Council meeting. Prior to the scheduling of these meetings, we received suggestions from members of the GOA Work Group.

Many of the comments elicited from the public were in response to questions offered by staff regarding the current suite of alternatives and proposals for bycatch, community allocations, and other management issues under consideration by the the Council's GOA Work Group.

Public Attendance: 10 members of the public

Meeting Representation: The public attending the meeting represented a variety of gear groups, with the largest representation coming from vessel owners and operators using trawl gear in the cod and pollock fisheries. An individual representing Trident Seafoods, the main processing facility in Sand Point also attended.

Major Themes: While the public scoping addressed a wide range of topics, the main topics of interest included the following:

Proposed Action:

Sand Point residents held several views on the need to modify the existing management of GOA groundfish fisheries and the appropriateness of the various approaches to modify the existing management structure. Many members of the public expressed a desire to establish a "fair start" provision for all size classes of vessels in the Pacific cod fishery in the Western GOA management area. This was seen as a more immediate concern than rationalizing the fisheries. In fact, some identified an interest in creating additional opportunities in the state water Pacific cod fishery for new participants.

Scope:

After noting that there was no need to rationalize the fisheries, most individuals recommended that *if* GOA groundfish management is modified from the status quo, then whatever management approach taken should address all species in all areas. No one commented on whether to include or exclude groundfish fisheries East of 140 degrees W. long. in a rationalization program. Several suggested incorporating species that were characterized as underutilized in the Western Gulf (e.g., flatfish and rockfish) in the alternatives under consideration. The major concern expressed about exempting these underutilized species is that doing so would essentially create a "race for fish" or increased pressure on those species by any individuals excluded from any rationalization program. Additionally, several individuals said that "rationalized" fishing operations would be able to target these underutilized species better than other non-rationalized, or open access fishing operations. There was not a specific suggestion on how those species should be incorporated in a

rationalization program.

Alternatives:

NMFS and Council staff reviewed some of the potential alternatives that have been suggested, including: rights-based management programs such as individual fishing quotas (IFQs); cooperatives similar to those established under the AFA; “two-pie” management with linked IFQ and processor quota shares (IPQs), so-called “three pie” management that would link landings to communities similar to recent action recommended by the Council to rationalize the Bering Sea crab fisheries; modifications of the license limitation program (LLP); and the status quo. Staff invited the public to suggest other alternatives, or hybrid alternatives that should be considered as well.

General Comments

While no one indicated a preference for the status quo, there were a variety of opinions on the other potential alternatives. There were several different opinions about the specific problem facing GOA groundfish fisheries. Several individuals identified the lack of a “fair start” provision in the Pacific cod fishery among the various gear groups as the greatest problem facing the local fisheries. These individuals also suggested that rationalization or other management measures could proceed on a separate and longer track so that a fair start measure could be enacted in the Western Gulf federal Pacific cod fishery quickly to address immediate needs. Several individuals seemed most concerned about the potential reduction in catch by the smaller trawl vessels relative to fixed gear vessels. While there was not agreement on a specific date for a “fair-start” provision, there was general support for a start date in February or early March designed to coincide with the pollock fishery.

Individuals noted that more vessels are coming to the region to fish during the State managed Pacific cod fishery resulting in shorter state fishery seasons. This increased competition may be affecting the overall profitability of local vessels in the state-managed fishery and increasing effort in the federal Pacific cod fishery. Generally, individuals felt that this increase in fishing effort increased due to the recent decline in salmon prices, and changes in salmon management in the region by the Alaska Board of Fisheries.

Rationalization Alternative

Generally, there was not strong support for any rationalization alternative. Comments about rationalization tended to be phrased in terms of a preferred approach *if* rationalization is chosen, but not as though rationalization were a preferred alternative. There was considerable debate about how to address the treatment of skippers and crew members in any rights-based management program, if one were adopted.

Several individuals did support the use of IFQs as the preferred rationalization alternative. Generally, individuals were concerned about the equity of the initial allocation mechanism since species underutilized by Sand Point residents would likely be fully allocated under an IFQ or cooperative program. One individual stated that there are too many boats chasing too few fish and that IFQs would provide an opportunity for vessels to slow their catch rate and possibly address Steller sea lion concerns, and fish more profitably.

Generally, there was support for the inclusion of skippers and crew in the allocation process. Several individuals suggested various allocation mechanisms for splitting the quota share allocation among vessel owners and skippers. Some suggested a 50/50 split between skippers and vessel owners, others suggested a lower, but less specific allocation. Several individuals noted that it would be difficult, if not impossible to

figure out a specific mechanism to allocate quota shares to crew members given the transient nature of crew member employment and poor records. Generally, individuals supported the idea of allocating some initial quota to skippers. Some individuals were concerned that IFQs are desired principally by vessel owners from other regions that fish in the local area who are looking to sell out of the fishery, and that the implementation of an IFQ program would not provide long-term access to local residents. Individuals believed IFQs must be transferable. Generally, caps on quota share consolidation were preferred, but there were no specific preferences for specific limits.

No individual from the fishing fleet advocated the use of “two-pie” or “three-pie” management. Individuals felt that “two-pie” management would reduce any ability by harvesters to find alternative markets or negotiate a more favorable price in Sand Point given the very limited opportunities to sell their catch to other processors in the region. A processing representative noted that processors have made substantial investments in the fishery and “two-pie” management should be considered.

Generally, the use of specific measures designed to “regionalize” the processing of catch or create community quota share programs were not considered either necessary or appropriate. Several individuals suggested that the allocation of community quota shares to communities such as Sand Point, which do not target rockfish and flatfish might reserve a portion of the total allowable catch (TAC) for each community and provide some protection or mechanism for participation for those that have not participated in the past.

There was not a specific recommendation either for or against the use of cooperatives. Many individuals seemed uncertain as to how cooperative management might actually function in the Western Gulf of Alaska.

A repeated concern was for including an opportunity for new entrants in whatever mechanism may be chosen. Expansion of the existing IFQ loan program was mentioned, but there were no additional specific suggestions on how new entrants could be better incorporated in a quota share program.

License Limitation Alternative

Individuals also suggested modifying the LLP as an alternative to rationalization. There were mixed opinions about whether modifying the LLP would address the short and long-term problems facing the groundfish fisheries. Several individuals suggested that removing “latent” licenses from the LLP, would address several concerns about limiting new entry into the fisheries. Others felt that modifying the LLP would not address the long-term concerns of the fishery and would not improve the ability of existing operators to remain competitive. Several individuals stated that the existing LLP allows larger vessels that have not historically participated in the Pacific cod fishery—particularly displaced BSAI crab vessels, to participate in the federal fishery. Other individuals stated that management within the “parallel” fishery also allows vessels to fish during the federal season without an LLP and recommended that the state take action to prevent this situation (see “Issues: parallel fishery”).

Issues:

Several of the key issues that were raised for further analysis included: (1) management in the “parallel” fishery—the fishery occurring in state waters opened during the federal fishery; and (2) differential

management among various management regions in the GOA and the importance of establishing “sideboards” if differential management measures are implemented.

Parallel fishery

Individuals noted that if any rationalization program is adopted, NMFS and the Alaska Department of Fish and Game should coordinate to address mutual management concerns. Some of the issues raised include: whether catch history from harvests in the parallel fishery from a vessel without an LLP would be included in any quota allocation, whether a federal quota program would be applicable to vessels fishing exclusively in the parallel fishery, and whether future management measures to further restrict the number of LLPs could be applied within the parallel fisheries. Several individuals suggested increasing the State managed Pacific cod guideline harvest level and requiring that if vessels fish within federal waters they would be prohibited from fishing in the state managed Pacific cod fishery. This measure was suggested to reduce the potential lack of controls within the existing parallel fishery management framework.

Differential Management

Many individuals suggested that different management strategies may be appropriate in different regions of the GOA. As an example, one individual suggested that different management systems could be approved for the Western and Central Gulf management regulatory areas. Individuals suggested that there would need to place “sideboards” to limit the potential spill-over effects that could occur if vessels are rationalized in one part of the GOA and vessels are then more able to participate in fisheries in other regions.

Other Comments:

Individuals requested that the notes from future public scoping meetings be placed on the web prior to the presentation of the draft scoping report to the Council in October.